

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

FRIENDS OF GEORGE’S, INC.,

*Plaintiff,*

v.

STEVEN J. MULROY,  
in his official and individual capacities,

*Defendant.*

Case No. 2:23-cv-02163-TLP-tmp

Case No. 2:23-cv-02176-TLP-tmp

**DECLARATION OF JAMES R. NEWSOM III IN SUPPORT OF  
REPLY IN SUPPORT OF MOTION TO DISMISS  
OF STEVEN J. MULROY IN HIS OFFICIAL CAPACITY**

I, James R. Newsom III, hereby declare as follows:

1. I am an attorney with the Office of the Tennessee Attorney General, counsel of record for Defendant Steven Mulroy in his official capacity as District Attorney General of Shelby County, Tennessee in the above-captioned action. I am duly licensed to practice law in the State of Tennessee and am admitted to the bar of this Court.
2. I make this declaration in support of Defendant's Reply in Support of Motion to Dismiss of Steven J. Mulroy in His Official Capacity ("Motion"), based on my own personal knowledge, and, if called to testify as to the truth of the matters declared herein, I could and would competently testify.
3. Attached as Exhibit B is a true and correct copy of excerpts from Plaintiff's Responses to Defendant's First Set of Interrogatories, Requests for Production of Documents, and Requests for Admission.
4. Attached as Exhibit C is a true and correct copy of excerpts from the transcript of the Fed. R. Civ. P. Rule 30(b)(6) deposition of Plaintiff Friends of George's, Inc. conducted on April 24, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and understanding.

Dated: May 12, 2023

Respectfully submitted,

JONATHAN SKRMETTI  
Attorney General and Reporter

s/James R. Newsom III  
James R. Newsom III (TN BPR No. 6683)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing report. Parties may access this filing through the Court's electronic filing system.

s/James R. Newsom III

James R. Newsom III  
Special Counsel